

## Global Inflight Products DIVISION OF ASSIC

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12 May 2004

Division of Dockets Management (HFA-305) U.S. Food and Drug Administration 5630 Fishers Lane, Room 1061 Rockville, MD 20852 USA



Subject: Docket Number 2002N-0278

Whereas Aviation Spares & Services Int'l. Co., Inc, dba Global Inflight Products is in the business of supplying commercial airlines worldwide with the items used in on-board passenger service, please find below two comments of behalf of our company to the proposed rule under the Prior Notice of Imported Food Under the Public Health Security and Bioterrorism Preparedness and Response Act of 2002, Docket Number 2002N-0278.

## Comment 1 -

We do not understand why the prior notice for ocean shipments destined for the USA cannot be done as soon as the vessel has been loaded in the port of origin, approximately 10-30 days before. The current system requires prior notice at max 3 days before arrival. It makes more sense to submit the prior notice at the same time that the shipment is being initiated, does it not?

## Comment 2 -

We also do not understand the need for alerting the FDA and/or the CBP that there will be some leftover unopened cans/bottle of soda and liquor (to be held in bonded storage) on flights inbound to the U.S. and intended for use on later flights. There is no danger to the American public from this operation. Additionally, there is no possible way to determine at "wheels up" what will remain upon landing in the USA. The rule should clearly exempt the beverages and liquor offered for sale or service aboard airlines.

Thanks & best regards,

Paul Rowley General Manager

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